



## **PROGRESS REPORT NO. 193**

**TO:** Bonnie Arthur, U.S. Environmental Protection Agency (EPA) – via electronic mail  
Robert Tan, EPA – via electronic mail

**FROM:** Denise Mills, Teck American Incorporated (TAI)

**Cc:** Kris McCaig, TAI – via electronic mail  
Rob Orr, TAI – via electronic mail

**DATE:** August 8, 2022

**FILE NO:** 01-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study (RI/FS) –  
Progress Report No. 193, Month Ending July 2022

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Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

### Soil Amendment Technology Evaluation Study (SATES)

- TAI submitted the draft interim data summary report (IDSR), which provides the data collected during the first year of field work completed for SATES Phases III and IV, to EPA and the SATES team for review on March 29, 2022. TAI led a call on April 19, 2022 that was focused on a review of the data collected and preliminary analysis of the results obtained to date. A technical call with EPA's SATES research team was held on June 13, 2022 to review and discuss the 2021 sampling results. TAI has received comments from the Citizens for a Clean Columbia on both the IDSR and the statistical analysis summary on July 1, 2022, and comments from EPA on the statistical analysis summary on July 8, 2022. EPA and TAI have a call scheduled for August 17, 2022 to discuss EPA's comments. TAI and EPA have agreed that comments on the IDSR will be addressed in the full DSR that will be prepared after all the field test data are available.
- TAI conducted the second round of 2022 soil sampling for the field test between July 18 and July 21, 2022. TAI submitted preliminary analytical results from the May 2022 sampling event to EPA on July 29, 2022.

## Upland Baseline Ecological Risk Assessment (BERA)

- On July 15, 2022, TAI received EPA's final comments regarding the Upland BERA and responses to TAI's April 18, 2022 responses to comments (RTC) on the June 24, 2021 Draft Interim Partial IP Upland BERA.
- TAI received Upland Lakes/Emergent Wetlands study questions and scope outline with expectations for an upland lakes study on May 6, 2022. Discussion between TAI and EPA regarding upland lakes continued through July. As of this writing, TAI has agreed to schedule and plan a field reconnaissance trip with EPA in early autumn 2022 to view upland lakes/wetlands identified by EPA as candidates for study in the May 6, 2022 scope outline.

Aquatic BERA – As follow up to recent correspondence and a conference call between TAI and EPA regarding the data useability assessment for the aquatic BERA, EPA asked to see an updated aquatic BERA data summary table similar to Table 4-1 in the draft IP Upland BERA. TAI agreed and, as of this writing, anticipates providing the data summary to EPA in August.

Sediment Transport Study – TAI received study questions from EPA on April 29, 2022, and coordinated a call with EPA that was held on July 19, 2022 to discuss TAI's proposed approach for sediment transport modeling and for addressing the sediment transport study questions prepared by EPA, many of which will be addressed in the Aquatic BERA, Aquatic RI report, or in the Aquatic FS report. As of this writing, TAI is anticipating further discussion about the sediment transport study, study questions, and scope during a call scheduled for August 24, 2022.

Upland RI Report – TAI received EPA's final comments on the pre-draft RI report (Draft IP Upland RI Report) on April 1, 2022. TAI submitted its RTC to EPA on July 1, 2022 and is awaiting EPA's responses. During a technical call on July 27, 2022, TAI and EPA discussed the proposed RI dataset included as Attachment 2 to the RTC. TAI is awaiting EPA's input regarding the proposed RI dataset.

Upland Soils – On July 12, 2022, TAI received a letter jointly issued by EPA and the Washington Department of Ecology (Ecology) offering TAI the opportunity to perform response actions in the upland portions of the UCR site and informing TAI of the removal action levels that will be used for soil removal actions in the future. On July 26, 2022, TAI responded via a joint letter to EPA and Ecology declining to perform the work and summarizing the reasons for TAI's decision.

## 2019 Phase 3 Sediment Study:

- Draft Phase 3 Sediment Study Data Analyses Technical Memorandum – TAI received EPA's comments on the draft technical memorandum via email on March 4, 2022. TAI reviewed the comments and identified several comments and topics for discussion with EPA for further clarification and to work toward a proposed resolution of those comments. A series of technical calls were held between TAI and EPA during April through June to discuss the comments and possible additional analyses. TAI presented results of additional bioassay analyses and concentration-response modeling during a with EPA's technical

BERA team on July 20, 2022 and provided the presentation materials along with a file containing additional modeling results to EPA for review (this information was provided to EPA on July 20 and on July 26, respectively). TAI is awaiting EPA's feedback regarding the additional Phase 3 bioassay data analyses.

- EPA Split Sample Reports

- Split Sediment and Porewater Chemistry Analyses, EPA Data Validation and Comparison Report – TAI is awaiting the final validation and comparison report from EPA. Upon receipt, TAI will upload the final report to the UCR RI/FS online database.
- Split Sample Bioassay Testing, EPA Data Verification and Validation Report for the U.S. Geological Survey Columbia Environmental Research Center (CERC) chemistry data – TAI is awaiting the final EPA data verification and validation report for the CERC bioassay porewater chemistry data. Upon receipt, TAI will upload the final report to the UCR RI/FS online database.

Updated RI/FS Schedule – On July 25, 2022, TAI received the Schedule Addendum to the Final UCR RI/FS Work Plan (December 2008) from EPA containing updated schedules for Upland RI/FS deliverables for the Upland portion of the UCR site (Operable Unit 3, or OU 3) and for the Aquatic portion of the UCR site (OU 1 and OU 2). Completion of this addendum culminates roughly 5-month joint effort between TAI and EPA in 2022 to prepare the updated schedules.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.